UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SERGEY SHESTAKOV,

Defendant.

Case No. 23 Cr. 16 (JHR)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Memorandum of Law in support of Motion to Compel and all prior pleadings and proceedings herein, Defendant Sergey Shestakov, by and through his counsel, hereby moves this Court, before the Honorable Judge Jennifer Rearden, United States District Judge, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be set by this Court, for an Order granting Mr. Shestakov's Motion to Compel the government to produce certain materials to the defense, and for such other relief as the Court may deem just and proper.

Dated: January 10, 2025 Respectfully submitted,

/s/ Rita M. Glavin

Rita M. Glavin Katherine E. Petrino Leo S. Korman Glavin PLLC 156 West 56<sup>th</sup> Street, Ste. 2004 New York, NY 10019

Tel: (646) 693-5505

Email: rglavin@glavinpllc.com

Counsel for Sergey Shestakov